

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF:)	CASE NO. 23-51015
)	CHAPTER 13
)	
REBECCA L. HORVATH)	JUDGE KOSCHIK
)	
)	
)	<u>RESPONSE TO MOTION FOR RELIEF</u>
)	<u>FROM STAY FILED BY SANTANDER</u>
)	<u>CONSUMER USA, INC.</u>

Now comes the debtor, Rebecca L. Horvath (the “Debtor”) by and through counsel, and in response to the motion for relief from stay filed by Santander Consumer USA, Inc., docket no. 42, states that the filing of the Motion, the co-obligor has made sufficient payments to bring the account current. The delay in payments was due to the Debtor originally providing for payments to be made directly through her plan. The plan was subsequently amended to provide for direct payment outside of the plan.

WHEREFORE, the Debtor requests that the motion be denied and for such other and further relief as the court deems appropriate.

Respectfully submitted,

/s/ Steven J. Heimberger
Steven J. Heimberger (#0084618)
Roderick Linton Belfance LLP
South Main Street, 10th Floor
Akron, OH 44308
(330) 434-3000
Fax: (330) 434-9220
sheimberger@rblllp.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on April 25, 2024, upon the following as follows:

Served Electronically via ECF:

- Kathryn A. Belfance kb@rlbllp.com, heimbergersr82735@notify.bestcase.com
- Stephen R. Franks amps@manleydeas.com
- Steven Heimberger sheimberger@rlbllp.com,
HeimbergerSR82735@notify.bestcase.com
- Cynthia A. Jeffrey bankruptcy@weinerlaw.com
- Michael J. Moran mike@gibsonmoran.com,
moranecf@gmail.com;r55982@notify.bestcase.com
- Matthew Murtland mmurtland@logs.com, LOGSECF@logs.com
- Keith Rucinski efilings@ch13akron.com
- United States Trustee (Registered address)@usdoj.gov

/s/ Steven J. Heimberger

Steven J. Heimberger (#0084618)